

# **EXHIBIT K**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BRIAN LABELLE,

Plaintiff,

No. 19-CV-03800 (JPO) (GWG)

- against -

BARCLAYS CAPITAL INC.,

Defendant.

**DECLARATION OF  
LARRY KRAVETZ**

LARRY KRAVETZ declares under penalty of perjury pursuant to 28 U.S.C. § 1746, that:

1. I am the Head of Primary Commercial Mortgage-Backed Securities (“CMBS”) Origination at Barclays Capital Inc. (“Barclays”). This Declaration is based upon my personal knowledge and information.

2. In or around November 2018, Barclays issued a legal hold instructing me to retain and preserve all records, documents, or other data relating to Mr. LaBelle from July 1, 2017, to September 30, 2018.

3. Pursuant to the legal hold, I did not delete any records, documents, or other data relating to Mr. LaBelle from any Barclays source, including my Barclays issued mobile device, which is (347) 610-7963.

4. In or around January 2020, Barclays’ in-house counsel, Elan Nehleber, also asked me to provide any text messages relating to Mr. LaBelle from my personal mobile device.

5. In accordance with Ms. Nehleber’s request, I reviewed my personal mobile device for text messages relating to Mr. LaBelle and provided all such messages to Barclays.

6. I did not knowingly delete any data from my personal mobile device relating Mr. LaBelle.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27<sup>th</sup> day of October, 2021

By:

  
Larry Kravetz